

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:

CASE NO. BK 13-40411
CHAPTER 11

GREAT PLATTE RIVER ROAD
MEMORIAL FOUNDATION,

Debtor.

**DEBTOR'S MOTION FOR SHORTENED
NOTICE PERIOD AND EXPEDITED
HEARING AS TO ITS UTILITY MOTION**

COMES NOW Great Platte River Road Memorial Foundation, ("Debtor") the Debtor and Debtor-in-Possession herein, and requests a shortened notice period and an expedited hearing on its Motion for Entry of an Order (a) Deeming its Utility Companies Adequately Assured of Future Performance, and (b) Establishing Procedures for Determining Requests for Additional Adequate Assurance (the "Motion") In support of its motion, Debtor states and alleges as follows:

1. Debtor's statements and allegations included in the Motion are incorporated herein by reference.
2. A shortened notice period and expedited hearing is necessary because NPPD has demanded a deposit of \$36,000 and the City of Kearney has threatened to shut off utility service if one or more pre-petition bills are not paid.
3. Continuing utility services to Debtor is essential to its ability to sustain operations while its Chapter 11 case is pending. An interruption of utility services, no matter how brief, would severely disrupt, and possibly terminate Debtor's business operations.

4. If Court does not allow a shortened notice period and an expedited hearing, Debtor may lose its ability to operate its business.

WHEREFORE, the Debtor hereby requests that the Court shorten the notice period and forthwith bring the Motion on for hearing.

Dated this 25th day of March, 2013.

GREAT PLATTE RIVER ROAD MEMORIAL
FOUNDATION, Debtor,

By: s/ T. Randall Wright

T. Randall Wright (NE# 16398)

Eric J. Adams (NE# 24545)

of BAIRD HOLM LLP

1500 Woodmen Tower

1700 Farnam St

Omaha, NE 68102-2068

Phone: 402-344-0500

Attorneys for Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Patricia Fahey
ustpreregion13.om.ecf@usdoj.gov

Jerry L. Jensen
Jerry.L.Jensen@usdoj.gov

Robert M. Gonderinger
rgonderinger@crokerlaw.com

David J. Skalka
dskalka@crokerlaw.com

In addition to the parties receiving electronic notice, the undersigned hereby certifies that a true and correct copy of the above and foregoing document was sent by regular United States first-class mail, postage prepaid, this 25th day of March, 2013 to the following:

Nebraska Public Power District
900 4th Ave.
PO Box 2170
Kearney, NE 68848

City of Kearney Utilities
18 East 22nd Street
P.O. Box 1180
Kearney, NE 68847

s/ T. Randall Wright _____